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Attorney for Defendant

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

JAMES M. KINDER,)	Case No. 07-cv-02132-DMS-AJB
)	
Plaintiff,)	Judge: Dana M. Sabraw
)	Mag. Judge: Anthony J. Battaglia
-against-)	
)	NOTICE OF MOTION;
NATIONWIDE RECOVERY SYSTEMS, LTD.,)	MOTION TO STAY
)	AND/OR FOR
Defendant.)	PROTECTIVE ORDER
)	
)	Date: N/A
)	Time: N/A
)	Courtroom: N/A
)	

TO ALL PARTIES AND THEIR ATTORNEYS:

PLEASE TAKE NOTICE that defendant, Nationwide Recovery Systems, Ltd. ("NRS"), files this Motion to Stay and/or for Protective Order and hereby provides notice of the filing.

1 NRS requests that the Court grant its Motion to Stay and/or for Protective Order, per
2 Fed. R. Civ. P. 26(c), and stay all discovery in these consolidated cases filed by plaintiff,
3 James M. Kinder, until further orders from this Court. Bryan C. Shartle, counsel for NRS, has
4 conferred in good faith with opposing counsel in an attempt to resolve this discovery dispute
5 without court action, but has been unsuccessful. NRS's motion is based on this notice and
6 motion, accompanying memorandum of points and authorities, the pleadings and papers on
7 file herein, and other such matters as may be presented to the Court at the time of the hearing.
8

9 Dated: February 11, 2008

Sessions, Fishman, Nathan & Israel, L.L.P.

11 /s/ Debbie P. Kirkpatrick

12 Debbie P. Kirkpatrick

13 Attorney for Defendant,

Nationwide Recovery Systems, Ltd.

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